Federal Defenders OF NEW YORK, INC.

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Tamara Giwa
Executive Director

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April 7, 2025

By CM/ECF

The Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Peter Weiser & Thomas Bransky

23 Cr. 514 (VSB)

Dear Judge Broderick:

We write to respectfully request a three-week adjournment of the April 7, 2025, deadline to file a motion to compel New York City to produce certain documents and communications it has withheld from the parties. The government consents to this application.

As the Court is aware, the defense has been engaged in discussions with the New York City Law Department regarding its withholding of certain communications and other documents on privilege grounds. The government has participated in these discussions as well. Consistent with those discussions, the Law Department made a redacted production to the parties on March 18, 2025. The defense is still reviewing the production and anticipates further discussions with the Law Department to narrow the scope of any motion to compel. To afford sufficient time for those discussions to take place and to limit unnecessary motion practice, an adjournment of the filing deadline is warranted.

Thank you for considering this application.

Respectfully Submitted,

Andrew John Dalack, Esq. Marisa K. Cabrera, Esq. Assistant Federal Defenders (646) 315-1527

Counsel for Thomas Bransky

Avraham Moskowitz, Esq. Christopher Neff, Esq.

Counsel for Peter Weiser

Cc: Counsel of Record

> The deadline to submit any motions to compel or quash is hereby extended to April 28, 2025.

Dated: April 8, 2025

APPLICATION GRANTED SO ORDERED A **VERNON S. BRODERICK** U.S.D.J.